

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
John B. Quinn (Bar No. 90378)
Shon Morgan (Bar No. 187736)
865 S Figueroa St 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100
Email: johnquinn@quinnemanuel.com
shonmorgan@quinnemanuel.com

David Eiseman (Bar No. 114758)
Melissa J. Baily (Bar No. 237649)
Carl G. Anderson (Bar No. 239927)
50 California Street, 22nd Floor
San Francisco, California 94111
Telephone: (415) 875 6600
Facsimile: (415) 875 6700
Email: davideiseman@quinnemanuel.com
melissabaily@quinnemanuel.com
carlanderson@quinnemanuel.com

Attorneys for Plaintiffs
Barnes & Noble, Inc. and
barnesandnoble.com llc

CHARLENE M. MORROW (CSB NO.
136411)
cmorrow@fenwick.com
VIRGINIA K. DEMARCHI (CSB NO.
168633)
vdemarchi@fenwick.com
HECTOR J. RIBERA (CSB NO. 221511)
hribera@fenwick.com
RYAN TYZ (CSB NO. 234895)
rtyz@fenwick.com
RAVI RANGANATH (CSB NO. 272981)
rranganath@fenwick.com
FENWICK & WEST LLP
Silicon Valley Center
801 California Street
Mountain View, California 94041
Telephone: (650) 988-8500
Facsimile: (650) 938-5200

Attorneys for Defendants
LSI Corporation and
Agere Systems Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BARNES & NOBLE, INC. and
BARNESANDNOBLE.COM LLC,

Plaintiffs,

v.

LSI CORPORATION and
AGERE SYSTEMS INC.,

Defendants.

Case No. 11-cv-02709 EMC

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
TIME FOR PATENT LOCAL RULE
DISCLOSURES**

Trial Date: None set

Pursuant to Local Rule 6-2, Plaintiffs Barnes & Noble, Inc. and Barnesandnoble.com LLC
("Plaintiffs") and Defendants LSI Corporation and Agere Systems Inc. ("Defendants")
(collectively, the "Parties"), by and through their respective counsel of record, hereby stipulate
and agree as follows:

STIPULATION REGARDING TIME FOR
PATENT LOCAL RULE DISCLOSURES

CASE NO.: 11-CV-02709 EMC

1 WHEREAS, the Court, by Order dated November 2, 2011 [Dkt. No. 63], set a Case
2 Management Conference in this matter for January 20, 2012, and required the Parties to file a
3 joint case management conference statement by January 13, 2012;

4 WHEREAS, the Court, by Order dated November 16, 2011 [Dkt. No. 65], granted the
5 Parties' Joint Stipulation giving Defendants until February 3, 2012 to serve their Disclosure of
6 Asserted Claims and Infringement Contentions pursuant to Patent L.R. 3-1 and 3-5 and produce
7 documents pursuant to Patent L.R. 3-2;

8 WHEREAS, the Parties agree that Defendants shall have a sixty day extension until April
9 3, 2012 to serve their Disclosure of Asserted Claims and Infringement Contentions pursuant to
10 Patent L.R. 3-1 and 3-5 and produce documents pursuant to Patent L.R. 3-2;

11 WHEREAS, the Parties further agree that all other deadlines for disclosures pursuant to
12 the Court's Patent Local Rules shall likewise be extended by a period of sixty days, and that the
13 Parties will provide the Court a complete proposed case schedule in conjunction with their Joint
14 Case Management Statement and Rule 26 Report;

15 WHEREAS, Defendants believe this extension is appropriate in view of the pending status
16 of the protective order and Plaintiffs' recently released model of the accused NOOK™ devices;

17 WHEREAS, the Parties do not expect that these proposed extensions will impact the
18 schedule ultimately set by the Court or alter the date of any event or deadline already fixed by
19 Court Order, with the exception of the date set forth in the Court's November 16, 2011 Order
20 granting the Parties' prior Joint Stipulation [Dkt. No. 65];

21 THE PARTIES HEREBY STIPULATE that Defendants shall have until April 3, 2012 to
22 serve their Disclosure of Asserted Claims and Infringement Contentions pursuant to Patent L.R.
23 3-1 and 3-5 and produce documents pursuant to Patent L.R. 3-2, all other deadlines for
24 disclosures pursuant to the Court's Patent Local Rules shall likewise be extended by a period of
25 sixty days, and the Parties will provide the Court a case schedule providing a complete proposed
26 case schedule in conjunction with their Joint Case Management Statement and Rule 26 Report.

27 ///

28 ///

1 Dated: December 23, 2011

FENWICK & WEST LLP

2
3 By: /s/ Ravi Ranganath

4 Ravi Ranganath

Attorneys for Defendants

LSI Corporation and Agere Systems Inc.

5
6 Dated: December 23, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

7
8 By: /s/ Carl G. Anderson

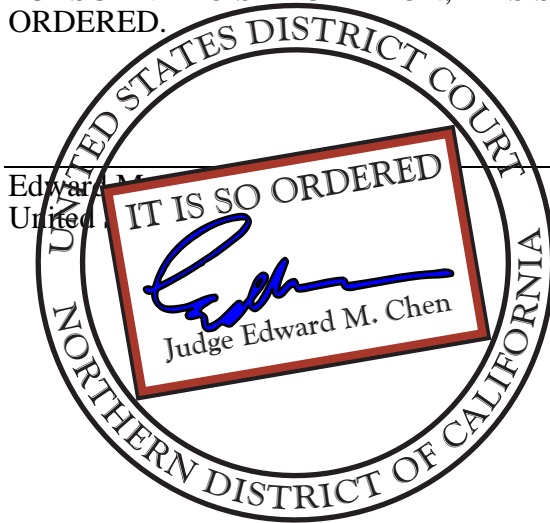
9 Carl G. Anderson

Attorneys for Plaintiffs

Barnes & Noble, Inc. and

barnesandnoble.com LLC

10
11
12
13
14 PURSUANT TO STIPULATION, IT IS SO
15 ORDERED.



ATTESTATION PURSUANT TO GENERAL ORDER 45

Pursuant to General Order No. 45, § X(B), regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from its signatories.

Dated: December 23, 2011

FENWICK & WEST LLP

By: /s/ Ravi Ranganath

Ravi Ranganath
Attorneys for Defendants
LSI Corporation and Agere Systems Inc.

FENWICK & WEST LLP
ATTORNEYS AT LAW
MOUNTAIN VIEW